

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
GUCCI AMERICA, INC., BALENCIAGA :
AMERICA, INC., BALENCIAGA S.A., BOTTEGA :
VENETA INTERNATIONAL S.A.R.L., :
BOTTEGA VENETA INC., LUXURY GOODS :
INTERNATIONAL (L.G.I.) S.A. and YVES SAINT :
LAURENT AMERICA, INC. :

2010 Civ. 4974 (RJS)

Plaintiffs,

NOTICE OF MOTION

-against-

WEIXING LI, LIJUN XU and TING XU a/k/a JACK :
LONDON, all doing business as REDTAGPARTY, :
MYLUXURYBAGS.COM, KUELALA.COM, :
XPRESSDESIGNERS.COM, :
XPRESSDESIGNER.NET, and DESIGNER :
HANDBAGS; ABC COMPANIES; :
and JOHN DOES, :

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law In Support of Plaintiffs' Motion to Compel Third Party Bank of China to Comply with this Court's Orders and Plaintiffs' Subpoena, Declaration of Robert L. Weigel, dated December 6, 2010, together with the exhibits thereto, and all prior pleadings and proceedings herein, Plaintiffs Gucci America, Inc., Balenciaga, S.A, Balenciaga America, Inc., Bottega Veneta International S.A.R.L., Bottega Veneta, Inc., Luxury Goods International (L.G.I.) S.A., and Yves Saint Laurent America, Inc. (collectively "Plaintiffs"), by their undersigned attorneys, will move this Court before the Honorable Richard J. Sullivan, United States District Judge, in Courtroom 21C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an order (i) compelling third party Bank of China, a

bank doing business in New York with branches located at 410 Madison Avenue and 42 East Broadway in Manhattan, to timely produce all documents called for by Plaintiffs' Subpoena, regardless of location of said documents; (ii) compelling Bank of China to confirm that it has frozen all of Defendants' accounts, regardless of location, in compliance with the Court's orders dated June 25, 2010 and July 12, 2010; (iii) permitting Plaintiffs to file a motion for contempt against Bank of China if the bank has not frozen all of Defendants' accounts at the bank, regardless of location, as required under the Court's orders (iv) awarding Plaintiffs attorneys' fees and costs incurred in bringing the instant motion; and (v) awarding such other relief as the Court may deem just and proper.

Dated: New York, New York
December 6, 2010

Respectfully submitted,

GIBSON, DUNN & CRUTCHER, LLP

By: /s/ Robert L. Weigel

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Yves Saint Laurent America, Inc.*